

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

BRIAN BONNER,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO. 3:06-cv-00715-MHT
	)	
INTERSTATE ARMS CORP., et al.,	)	
	)	
Defendants.	)	

**MOTION TO RECONSIDER**

COMES NOW the plaintiff, BRIAN BONNER, and moves this Honorable Court to reconsider its Order of May 22, 2008 denying Plaintiff's Unopposed Motion to Extend Discovery Deadlines and states as follows:

1. This case involves two Chinese based defendants and the scheduling of depositions has been very difficult.
2. On February 22, 2008 defendant's requested a sixty (60) day extension to name experts which the undersigned agreed to and this Court granted on February 29, 2008. That placed the Defendants' expert deadline on May 2, 2008, leaving only twenty-four (24) days to complete those depositions.
3. The matter presently in front of the Court is not a jury matter and is a bench trial pursuant to the Foreign Sovereigns Immunity Act.

4. Dispositive motions have already been briefed in this matter and the request for extension of discovery will not affect the filing of dispositive motions and/or the trial of this case. The undersigned was remiss in failing to inform the Court of these factors in the original motion.

WHEREFORE, PREMISES CONSIDERED, plaintiff prays that this Court will reconsider its Order of May 22, 2008 and grant Plaintiff's Unopposed Motion to Extend Discovery Deadlines.

**/s/ David J. Hodge**  
DAVID J. HODGE  
Of Counsel for Plaintiff

**OF COUNSEL:**

PITTMAN, DUTTON, KIRBY & HELLUMS, P.C.  
2001 Park Place North  
1100 Park Place Tower  
Birmingham, Alabama 35203  
(205) 322-8880  
(205) 328-2711 facsimile

Nick Wooten, Esq.  
WOOTEN & CARLTON, P.C.  
P.O. Drawer 290  
Lafayette, Alabama 36862

**CERTIFICATE OF SERVICE**

I hereby certify that on **28<sup>th</sup>** day of **May**, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Todd M. Higey, Esq.  
RICHARDSON CLEMENT, P.C.  
200 Cahaba Park Circle, Suite 125  
Birmingham, AL 35242  
*Attorney for Interstate Arms and Qiqihar Hawk*

James C. Barton, Jr., Esq.  
Alan D. Mathis, Esq.  
JOHNSTON, BARTON, PROCTOR & POWELL, LLP  
2900 Regions/Harbert Plaza  
1901 6th Avenue North  
Birmingham, AL 35203  
*Attorney for Norinco*

**/s/David J. Hodge**  
Of Counsel for Plaintiff